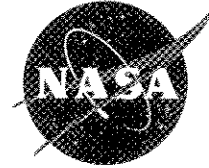


National Aeronautics and Space Administration  
Headquarters  
Washington, DC 20546-0001



October 21, 2008

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Widely Attended Gathering Determination Regarding Attendance by NASA Employees at the National Space Club's 4<sup>th</sup> Quarter Luncheon on November 7, 2008.

On November 7, 2008, the National Space Club (NSC) will host and sponsor a luncheon at the Grand Hyatt Washington, Washington, DC. The speaker for the luncheon will be Mary Glackin, Deputy Under Secretary for Oceans and Atmosphere at the Dept. of Commerce. The NSC's major sponsors are various contractors in the aerospace industry, including contractors for NASA.

The luncheon will be attended by senior leaders of the aerospace industry, trade associations, congressional staffs, and other Federal personnel, including military officers. Approximately 200 people have been invited and 120 are expected to attend. The estimated cost of the luncheon, which includes all food and beverages, is \$75.00 per person. I find that the NSC event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the luncheon will allow NASA representatives to hear Mary Glackin speak on the climate, and will allow discussion of issues relevant to civil space. Accordingly, NASA employees whose duties do not substantially affect the NSC, or a majority or all of its members, may accept an invitation for free attendance to the luncheon.

NASA employees whose duties may substantially affect the NSC or its members, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone